

FILED

FEB 21 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LORETTA BILLUPS,

Defendant.

No.

4:19CR00141 JAR/SPM

INDICTMENT

COUNT I

The Grand Jury charges that:

On or about September 10, 2017, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the Social Security Number of T.R., knowing that the means of identification belonged to another actual person, with the intent to commit, and in connection to the felony crime of theft of government funds, Title 18, United States Code, Section 641, and the said means of identification was transported in the mail in the course of such use.

In violation of Title 18, United States Code, Section 1028(a)(7).

COUNT II

The Grand Jury further charges that:

On or about September 10, 2017, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Social Security Number of T.R., during and in relation to the commission of the felony offense of theft of government funds, Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Section 1028A.

COUNT III

The Grand Jury further charges that:

On or about September 1, 2016, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the Social Security Number of A.S., knowing that the means of identification belonged to another actual person, with the intent to commit, and in connection to the felony crime of theft of government funds, Title 18, United States Code, Section 641, and the said means of identification was transported in the mail in the course of such use.

In violation of Title 18, United States Code, Section 1028(a)(7).

COUNT IV

The Grand Jury further charges that:

On or about September 1, 2016, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Social Security Number of A.S., during and in relation to the commission of the felony offense of theft of government funds, Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Section 1028A.

COUNT V

The Grand Jury further charges that:

On or about March 1, 2017, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the Social Security Number of M.J., knowing that the means of identification belonged to another actual person, with the intent to commit, and in connection to the felony crime of theft of government funds, Title 18, United States Code, Section 641, and the said means of identification was transported in the mail in the course of such use.

In violation of Title 18, United States Code, Section 1028(a)(7).

COUNT VI

The Grand Jury further charges that:

On or about March 1, 2017, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the Social Security Number of M.J., during and in relation to the commission of the felony offense of theft of government funds, Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Section 1028A.

COUNT VII

The Grand Jury further charges that:

From approximately May 1, 2016 through August 31, 2018, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

did embezzle, steal, purloin, and knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$18,729.36 in Social Security Administration Supplemental Security Income benefits, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

COUNT VIII

The Grand Jury further charges that:

From approximately January 1, 2015, through August 31, 2018, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

did embezzle, steal, purloin, and knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$72,100.54 in food stamp benefits, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

COUNT IX

The Grand Jury further charges that:

On or about January 31, 2018, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,

did knowingly and willfully make and cause to be made a false statement or representation of a material fact for use in determining her rights to payment of Social Security Administration Title

XVI benefits, with the intent to fraudulently secure Title XVI benefits either in an amount greater than was due or when no payment was authorized, to wit: **LORETTA BILLUPS** stated on a Redetermination Summary for Determining Continuing Eligibility Benefits for Supplemental Security Income Payments for the Social Security Administration that she did not have any other type of income when, as **LORETTA BILLUPS** well knew, she was collecting income from a criminal enterprise involving food stamp fraud.

In violation of Title 42, United States Code, Section 1383a(a)(2).

COUNT X

The Grand Jury further charges that:

From approximately January 1, 2015, through August 31, 2018, within the Eastern District of Missouri, the defendant,

LORETTA BILLUPS,
did acquire and possess food stamps having a value of \$5,000.00 or more, and by such conduct obtained \$5,000.00 or more in a manner not authorized by Chapter 51, Title 7, United States Code, in that food stamps valued at \$72,100.54 were acquired and possessed by **LORETTA BILLUPS** as a result of her submission of fraudulent food stamp applications.

In violation of Title 7, United States Code, Section 2024(b).

A TRUE BILL.

FOREPERSON

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